

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUBEN WEIGAND and HAMID AKHAVAN,

Defendants

Case No. 20-cr-188 (JSR)

**DECLARATION OF MICHAEL J. GILBERT IN SUPPORT OF
DEFENDANT RUBEN WEIGAND’S MEMORANDUM OF LAW
IN OPPOSITION TO THE GOVERNMENT’S MOTIONS *IN LIMINE***

I, MICHAEL J. GILBERT, declares as follows:

1. I am licensed to practice in New York, admitted to the Bar of this Court, and a Partner at the firm Dechert LLP, attorneys for Defendant Ruben Weigand (“Weigand”) in the above-captioned case. I submit this declaration in support of Weigand’s Opposition to the Government’s Motions *in Limine*, ECF Nos. 168 and 170.

2. Attached as **Exhibit A** is a true and correct copy of GX 4004-A, bates-stamped USAO_41004-A and excerpted at pages 82–83.

3. Attached as **Exhibit B** is a true and correct copy of screenshots taken from Web Shield’s website on February 23, 2021.

4. Attached as **Exhibit C** is a true and correct copy of the Government’s November 3, 2020 Expert Notice provided to defense counsel in the above-captioned case pursuant to Rule 16 of the Federal Rules of Criminal Procedure.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 23, 2021

/s/ Michael J. Gilbert
Michael J. Gilbert